

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
)
The Use of N11 Codes and Other) CC Docket No. 92-105
Abbreviated Dialing Arrangements)

**COMMENTS
OF THE
NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION**

The National Telecommunications Cooperative Association (NTCA)¹ submits these comments in response to the FCC's (Commission's) Notice of Proposed Rulemaking (NPRM, or Notice)² seeking comment on various abbreviated dialing arrangements that could be used by state "One Call" notification systems in compliance with the Pipeline Safety Act of 2002 (the Pipeline Safety Act).³

After examining various alternatives, the North American Numbering Council (NANC) has recommended that the nationwide abbreviated dialing code mandated by the Pipeline Safety Act be implemented using an N11 code, specifically 811.

¹ NTCA is the premier industry association representing rural telecommunications providers. Established in 1954 by eight rural telephone companies, today NTCA represents more than 560 rural rate-of-return regulated telecommunications providers. All of NTCA's members are full service incumbent local exchange carriers (ILECs) and many of its members provide wireless, cable, Internet, satellite and long distance services to their communities. Each member is a "rural telephone company" as defined in the Communications Act of 1934, as amended (Act). NTCA's members are dedicated to providing competitive modern telecommunications services and ensuring the economic future of their rural communities.

² In the Matter of the Use of N11 Codes and Other Abbreviated Dialing Arrangements, FCC 04-111, CC Docket No. 92-105, released May 14, 2004.

³ Pipeline Safety Improvement Act of 2002, Pub. L. No. 107-355, §17, 116 Stat. 2985, 3008 (2002) ("Pipeline Safety Act").

While the Commission has assigned 211 for information and referral services, 311 for non-emergency police and other governmental services, 511 for travel and information services, 711 for telephone relay services for the hearing impaired, and 911 as the national emergency number, 411, 611 and 811 have not yet been assigned by the Commission for nationwide use. The Commission allows these codes to be used by carriers for their own purposes, “provided that such use can be discontinued on short notice.”⁴

An informal sampling of NTCA members indicated that implementing 811 as the abbreviated dialing arrangement for reaching the state One Call notification system would not cause the companies undue technical hardship but would involve some costs and difficulties. First off, there would be labor involved in modifying switches to route 811 calls to the toll-free One Call number, and hence costs incurred. While NTCA does not have detailed information to show what these costs are, it is obvious the burdens associated with implementation will have a greater impact on smaller companies with limited staffing and a smaller subscriber base. In addition, those companies already using 811 for other purposes would need to educate their customers about the change and to make some arrangement for avoiding the accidental forwarding of calls meant for the telephone company to the One Call center. This, again, would require the commitment of scarce resources. In view of these factors, the Commission should make it clear that companies are allowed to recover compliance costs in the interstate jurisdiction. Local rates should not have to bear the costs of implementing a federal rule.

Several NTCA member companies currently utilize the 811 abbreviated dialing code for various purposes, such as for reaching the company’s business office or

⁴ NPRM, at 5.

requesting repair service. Doing so provides the customer a benefit in the form of an easily remembered and quickly dialed means of contacting their service provider for assistance. NTCA's member companies recognize the Commission's authority to assign these codes as it sees fit; if the FCC designates 811 as the abbreviated dialing arrangement for reaching the state One Call notification system, these companies will cease their internal use of the code. However, allowing these companies to utilize remaining unused abbreviated dialing codes for their own business purposes will afford their customers the same benefits currently available through their use of 811. The Commission should therefore make it clear that companies are still allowed to use the remaining unused abbreviated dialing codes and consider reserving at least one abbreviated dialing code that companies can use internally as they deem appropriate.

CONCLUSION

For the foregoing reasons, if the FCC should designate 811 as an abbreviated dialing arrangement to access state One Call notification systems, it should ensure that small companies can recover the additional costs of compliance from the interstate jurisdiction. Customers of these carriers do, however, benefit from the companies' use of abbreviated dialing codes for their own business purposes, and the Commission should strive to reserve at least one of the eight abbreviated dialing codes for use by individual companies at their own discretion.

Respectfully submitted,

NATIONAL TELECOMMUNICATIONS
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July 8, 2004

CERTIFICATE OF SERVICE

I, Gail Malloy, certify that a copy of the foregoing Comments of the National Telecommunications Cooperative Association in CC Docket No. 92-105, FCC 04-111 was served on this 8th day of July 2004 by first-class, U.S. Mail, postage prepaid, to the following persons.

/s/ Gail Malloy

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